

EXHIBIT E

11/6/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Attorneys' Eyes Only

Sergey Edunov

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2 BY ATTORNEY STEIN:

3 Q. If you turn to the second page --

4 A. Mm-hmm.

5 Q. -- it mentions that the original Llama was
6 trained on research datasets that couldn't be used
7 for commercial purposes.

8 Do you see that?

9 A. Yeah, I see it.

10 Q. What's your understanding of why these
11 research datasets could not be used for commercial
12 purposes?

13 ATTORNEY MORTON: Objection. I caution
14 the witness to the extent that might reveal any
15 attorney-client privileged information.

16 If you can answer to the extent without
17 revealing any information, you may do so.

18 THE WITNESS: Yeah, so that is based on
19 our recommendation we wrote from our legal team.

20 BY ATTORNEY STEIN:

21 Q. What datasets was original -- the original
22 Llama trained on?